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03:22:20 PM

To: NCIC OPPT/DC/USEPA/US@EPA, Rtk Chem/DC/USEPA/US@EPA
cc: "Gentil, W (Bill)" <William.Gentil@akzo-nobel.com>

Subject: Fyrol FR-2 (CAS#13674-87-8)

As requested in the 8/9/01 letter from EPA to Akzo Nobel Chemicals Inc., attached are the revised robust summaries for Fyrol FR-2 (CAS# 13674-87-8). In addition, new laboratory studies on melting point, water solubility and octanol:water partition coefficient have been conducted and their summaries are attached. Robust summaries on fugacity and photodegradation using a computer model are also included. A robust summary on a recently identified report of a skin sensitization study is also attached. The test plan has also been updated. Below are comments on the revised robust summaries. All summaries are in Word format.

Thanks.

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Hydrolysis - It appears that EPA probably used a value of 100% for zero time and then used the 96% value for the 30 days timepoint. Akzo Nobel states that the measured value at time zero was 113%. If EPA used 113%, the 96% at 30 days would give the linear regression value in the Akzo Nobel summary. If EPA used the nominal 100% rather than the measured 113%, then the 30 day value would be 84%.

Boiling Point - Additional references have been added

Vapor Pressure - Additional references have been added

Repeated Dose Toxicity - A description of the pathology of non-neoplastic changes has been provided

Developmental Toxicity - Data on resorptions/fetal viability have been given. The NOEL has been changed from 400 to 100 mg/kg.

Genetic Toxicity - Since the Multiple Endpoint Assay is a single test that examines gene mutation, sister chromatid exchange and chromosome aberration, there can only be one summary for these endpoints. The requested detailed information could not be found in the report.

Aquatic Toxicity - Information on parameters such as water hardness, pH, dissolved oxygen concentration has been provided